

Before the  
Federal Communications Commission  
Washington, DC 20554

SEP 27 1995

DOCKET ROOM

**In the Matter of**

**Amendment of Part 95 of the )  
Commission's Rules to )  
Establish a Very Short Distance )  
Two-Way Voice Radio Service )**

**WT Docket 95-102**

**Comments to a Notice of Proposed Rule Making**

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GMRS Call sign : KAD7520 Repeater call sign KAD5353

Signature : *William Lawton*

Date : 9-24-95

I have been a satisfied user of the GMRS radio band since 1984. I have also been a member and part owner of the Catoctin Communications Club during this same time. We have several users and part owners, and operate a repeater from Gambrel State Park area near Frederick Md.

For several years prior to 1984 I was a licensed CB operator. The CB band had become so abused by users and neglected by the FCC it virtually became unusable. It was so abused with fowl language and abusive users that it was inappropriate for children to listen too.

I am absolutely sure the FCC is aware that the reason this occurred is the unlicensed of the Citizens Band. When Licensing was no longer required of Citizens Band Radios and the FCC stopped monitoring and fining abusers it perpetuated to such a high level that only the most unconcerned of abuse and language stayed on the band. It virtually became a truck drivers radio band.

The GMRS band is the most reliable and cost effective radio communications still allowed for the general public. Its needs meet the demand for many law abiding ordinary citizens who are willing to help police the band and are trying to keep this band usable for those that do find a value in the moral ethics of society. Most users are courteous and considerate of others and most afford this reciprocation from others. The Catoctin Communications Club has always been a front runner regarding courtesy and policing the band for law breakers. Our club also does help the community through providing communications for events that take place in our area. We have been asked and have several times responded with members and communications for local events.

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I have personally used the GMRS radio service for emergency communications as well. I am a EMS Officer of the local Fire Company and have used this communication for emergencies when other communications were not available

The Repeater system we operate gives us a reliable repeater range of 40 miles from the tower site. Its cost is less per month than the cost of cellular phones and the reliability is better than the cellular phone. Also with a cellular phone we would have to pay absorbent ROAM charges in the same area as our Repeater covers at no additional cost. More and more citizens are finding the great features of the GMRS band and moving to this type of operation. There is no test to obtain a license. The FCC now longer allows businesses to intrude on the GMRS band. The equipment is becoming more affordable. Many repeater operations are being added. Most legal operators are trying to keep this band free of the abuse that Citizens Band radio was so recognized for.

For the general public, short range communication, there are portable radios on 49 mhz band produced by the same companies that are trying to ruin our GMRS band. These portable radios are reliable for short range communications and do not require a license. I really can't understand why these are not sufficient for this type of use and abuse.

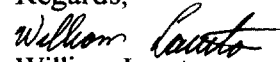
In my opinion the unlicensed use of some of the GMRS band will cause the same havoc as was created many years ago with the Citizens Band radios. Using frequencies that overlap those frequencies on which GMRS repeaters operate will cause considerable interference and cause them to become ineffective and unusable. I can not believe that the FCC would even consider the request of the big money companies such as Radio Shack to do as they wish to this band. It is strictly a request for a money making operation in the short term for these companies and no consideration is being given for the overall long-term outcome. It is simply transplanting the CB band and its abuse to the best operating general radio band there is in use today.

FRS operation must be secondary to GMRS band users. GMRS users should not have to tolerate interference by FRS users and for the FCC to ignore this is absolutely unacceptable.

The FCC has virtually ignored many of the concerns raised by the individual<sup>s</sup> and repeater licensees. I have found this unacceptable behavior for a government agency that is hopefully there to help the citizenry and not just listen to the big companies such as Radio Shack.

Many of us have invested considerable money and time into the lawful and proper operation of the GMRS radio band. We would be completely destroyed by the proposed change in the FCC rules of today's GMRS band. I would respectfully submit that the FCC reconsider its position on this matter and be an advocate of the citizens and not the Big Money Companies.

Regards,

  
William Lawton